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IN THE UNITED STATES DISTRICT COURT FOR
FOR THE CENTRAL DISTRICT OF ILLINOIS
ROCK ISLAND DIVISION

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FEDERAL ELECTION COMMISSION,)

Plaintiff,)

v.)

FRIENDS OF LANE EVANS, and)

SAMUEL M. GILMAN, as treasurer,)

17TH DISTRICT VICTORY FUND, and)

CHRIS HANCE, as treasurer,)

And)

ROCK ISLAND DEMOCRATIC)

CENTRAL COMMITTEE, and)

JOHN A. GIANULIS, as treasurer,)

Defendants.)

No. 04-CV-4003

Judge Joe Billy McDade

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff Federal Election Commission ("Commission"), and Defendants Friends of Lane Evans and Samuel M. Gilman, as treasurer, 17th District Victory Fund and Chris Hance, as treasurer, and Rock Island Democratic Central Committee and John A. Gianulis, as treasurer (collectively "Defendants"), hereby stipulate that:

1. Defendants enter into this Stipulation and the Consent Judgment for the purpose of settling this litigation without conceding the legal position asserted by Plaintiff in this case. Because the actions and events at issue in this case occurred prior to the amendments to the Federal Election Campaign Act (the "Act"), enacted by the Bipartisan Campaign Reform Act of

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2002, Defendants believe that the primary legal issues have been mooted and no longer bear on their legal interests. Plaintiff and Defendants agree that in light of all the relevant circumstances, it is in the interests of all parties to avoid the additional expense incurred by further litigation.

2. Payment of \$185,000 by Defendant Friends of Lane Evans to the Commission will satisfy any and all liability, potential and actual, for any and all alleged violations of the Act by Friends of Lane Evans and Samuel M. Gilman, as treasurer, and 17th District Victory Fund and Chris Hance, as treasurer, in this litigation and in MUR 5031.

3. Defendant Friends of Lane Evans will pay \$50,000 to the Commission within thirty days of the entry of the attached Consent Judgment. Defendant Friends of Lane Evans will pay nine equal payments of \$15,000 to the Commission every thirty days thereafter.

4. Defendant 17th District Victory Fund will pay to the Commission within 30 days of the entry of the Consent Judgment all funds remaining in its accounts on the date the parties execute this stipulation.

5. Payment of \$30,000 by Defendant Rock Island Democratic Central Committee to the Commission will satisfy any and all liability, potential and actual, for any and all alleged violations of the Act by the Rock Island Democratic Central Committee and John A. Gianulis, as treasurer, in this litigation and in MUR 5031.

6. Defendant Rock Island Democratic Central Committee will pay \$30,000 to the Commission within thirty days of the entry of the attached Consent Judgment.

7. The 17th District Victory Fund will terminate as a federally-registered political committee with the Commission after it has paid to the Commission the amount specified in paragraph 4 and otherwise met the requirements of 11 C.F.R. § 102.3.


8. The parties agree that they will bear their own respective costs and attorneys fees, and Defendants waive any right they may have to appeal or to seek relief under the Equal Access to Justice Act, 28 U.S.C. § 2412.

9. This Stipulation is contingent upon entry of the Consent Judgment by order of the Court.

10. Plaintiff and Defendants agree that the Court should enter the attached Consent Judgment.

Respectfully submitted,

FOR THE PLAINTIFF
FEDERAL ELECTION COMMISSION


Lawrence H. Norton
Richard B. Bader
David Kolker
Kevin Deeley
Steve N. Hajjar

999 E Street, N.W.
Washington, D.C. 20463
(202) 694-1650

Dated: June 20, 2005

FOR THE DEFENDANTS
FRIENDS OF LANE EVANS and SAMUEL
M. GILMAN, AS TREASURER, 17TH
DISTRICT VICTORY FUND and CHRIS
HANCE, AS TREASURER, and ROCK
ISLAND DEMOCRATIC CENTRAL
COMMITTEE and JOHN A. GIANULIS, AS
TREASURER



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Dated: June 9, 2005

United States District Court

CENTRAL DISTRICT OF ILLINOIS

JUDGMENT IN A CIVIL CASE**Federal Election Commission**

vs.

JUN 28 2005

U.S. DISTRICT COURT
ROCKFORD, ILL.

Case Number: 04-4003

**Friends of Lane Evans, and Samuel M. Gilman,
as treasurer, 17th District Victory Fund, and Chris
Hance, as treasurer, and Rock Island Democratic
Central Committee, and John A. Gianulis, as treasurer**

☐ **JURY VERDICT.** This action came before the Court for a trial by jury. The issues have been tried and the jury has rendered its verdict.

XX DECISION BY THE COURT. This action came to trial or hearing before the Court. The issues have been tried or heard and a decision has been rendered.

IT IS ORDERED AND ADJUDGED that Judgment is entered in favor of the plaintiff and against the defendant pursuant to order entered 6/27/2005.

ENTER this 28th day of June, 2005

JOHN M. WATERS, CLERK

T. Peebles
BY: DEPUTY CLERK

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